

**OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION**

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

ORIGINAL
ILLINOIS COMMERCE COMMISSION
FEB 5 10 35 AM '01
CHIEF CLERK'S OFFICE

Petition for Resolution of)
Disputed Issues Pursuant to)
Condition (30) of the)
SBC/Ameritech Merger Order)

01-0120

JOINT PETITION

Pursuant to the Commission's Orders of September 23, 1999, November 15, 1999, and November 23, 1999, Illinois Bell Telephone Company ("Ameritech Illinois"), along with AT&T Communications of Illinois, Inc. ("AT&T"); TCG Illinois, TCG Chicago, TCG St. Louis, CoreComm Illinois, Inc.. ("CoreComm"); WorldCom, Inc. ("WorldCom"); McLeodUSA Telecommunications Services, Inc. ("McLeodUSA"); XO Illinois, Inc. ("XO"); Northpoint Communications, Inc. ("NorthPoint"); Rhythms Netconnections and Rhythms Links, Inc. ("Rhythms"); Sprint Communications L.P. ("Sprint"); Focal Communications Corporation of Illinois ("Focal"); and Gabriel Communications of Illinois, Inc. (collectively "CLECs"), respectfully request that the Commission resolve certain disputed issues arising out of the collaborative process required by Condition (30) of the SBC/Ameritech Merger Order (Docket 98-0555). In support of their joint submission, the parties state as follows:

1. Pursuant to Condition (30) of the SBC/Ameritech Merger Order, Ameritech Illinois, Staff and interested CLECs have been engaged in a collaborative process addressing performance measures, benchmarks and liquidated damages commitments. The parties participating in the Illinois collaborative have met 10 times covering 19 days and held 5 conference calls over a period of 10 months. In the course of these meetings, the parties have made significant progress in developing performance measurements that address specific areas of CLEC concern. Ameritech Illinois has agreed to add 38 new measurements, which disaggregate into 279 additional submeasures. Ameritech Illinois has also agreed to modify 70 existing measurements, adding 160 additional submeasures. It has modified basic business rules for 22 measurements. In addition, CLECs and Ameritech Illinois have agreed to remove 9 of the original Texas measurements.

2. At this juncture, there are no performance measurements which are still in dispute between Ameritech Illinois and the CLECs. Ameritech Illinois and the CLECs have agreed to a quarterly status meeting during March, when they will discuss progress to date as well as set the groundwork for the six-month review meeting to be scheduled for June 2001. Separately, Ameritech Illinois will be filing revised tariff pages implementing these agreed-upon performance measurements. A list of the agreed upon performance measures and applicable standards is attached as Appendix A.

3. There are two areas in which Ameritech Illinois and the CLECs are not in agreement. First, the parties disagree as to the appropriate remedies. Ameritech Illinois believes that the Texas Remedy Plan should be implemented, as has been done in accordance with the Company's commitment in the SBC/Ameritech merger proceeding. The CLECs have sponsored the Joint CLEC Remedy Plan, which they argue should be adopted by the Commission.¹ Second, the Joint CLEC Remedy Plan recommends that remedies be triggered if Ameritech Illinois' wholesale performance, while at parity with retail performance standards, still is below state-mandated performance benchmarks. Ameritech Illinois does not support this proposal.

4. The Joint Petitioners request that a proceeding be initiated addressing the above-described issues, so that they can be resolved by the Commission.

WHEREFORE, in view of the foregoing, the Petitioners request that a proceeding be initiated to resolve the issues outlined in this Joint Petition.

Respectfully submitted,

¹ Sprint introduced a separate remedy plan in the collaborative discussions that it may or may not introduce in this proceeding.

By: Louise A. Sunderland

Louise A. Sunderland

As Authorized By:
AMERITECH ILLINOIS

Date: 1/24/01

STATE OF ILLINOIS

COUNTY OF COOK

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) SS
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VERIFICATION

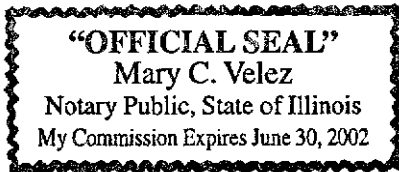
I, Louise A. Sunderland, on oath state that I represent Ameritech Illinois, that I have read the foregoing Joint Petition, and that the information contained therein is true and correct to the best of my knowledge and belief.

Louise A. Sunderland

Subscribed and Sworn to
Before me this 24 day of
January, 2001.

Mary C. Velez
Notary Public

My Commission Expires: June 30, 2002



By: Douglas W. Trabari
(signature)

Douglas W. Trabari
(printed or typed name)

As Authorized By:
AT & T COMMUNICATIONS, INC.

Date: 1/11/01

STATE OF ILLINOIS

COUNTY OF COOK

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SS

VERIFICATION

I, Douglas W. Trabari, on oath state that I represent AT & T Communications of Illinois, Inc., that I have read the foregoing Joint Petition, and that the information contained therein is true and correct to the best of my knowledge and belief.

Douglas W. Trabari

Subscribed and Sworn to
Before me this 12th day of
January, 2001.

Margaret M. Plucinsky
Notary Public

My Commission Expires: May 12, 2003



By: Doug Trabari
(signature)

Douglas W. Trabari
(printed or typed name)

As Authorized By:
TCG ILLINOIS, TCG, CHICAGO AND TCG ST. LOUIS

Date: 1 / 11 / 01

STATE OF ILLINOIS

COUNTY OF COOK

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VERIFICATION

I, Douglas W. Trabari, on oath state that I represent TCG Illinois, TCG, Chicago and TCG St. Louis, that I have read the foregoing Joint Petition, and that the information contained therein is true and correct to the best of my knowledge and belief.

Doug Trabari

Subscribed and Sworn to
Before me this 12th day of
January, 2001.

Margaret M. Plucinsky
Notary Public

My Commission Expires:

May 12, 2003



By: Thomas J. O'Brien
(signature)

Thomas J. O'Brien
(printed or typed name)
As Authorized By:
CORECOMM ILLINOIS, INC.

Date: 1-11-01

STATE OF OHIO

COUNTY OF FRANKLIN

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VERIFICATION

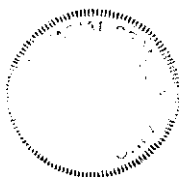
I, Thomas J. O'Brien, on oath state that I represent CoreComm Illinois, Inc., that I have read the foregoing Joint Petition, and that the information contained therein is true and correct to the best of my knowledge and belief.

Thomas J. O'Brien

Subscribed and Sworn to
Before me this 11th day of
January, 2001.

[Signature]
Notary Public

My Commission Expires:



ERIC RAY
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES JUNE 20, 2001

By: Darrell Townsley
(signature)
DARRELL TOWNSLEY
(printed or typed name)

As Authorized By:
WORLD COM, INC.

Date: 1/11/01

STATE OF ILLINOIS

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COUNTY OF COOK

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VERIFICATION

I, DARRELL TOWNSLEY, on oath state that I represent WorldCom, Inc., that I have read the foregoing Joint Petition, and that the information contained therein is true and correct to the best of my knowledge and belief.

Darrell Townsley

Subscribed and Sworn to
Before me this 11 day of
January, 2001.

Pauline M. Kerkstra
Notary Public

My Commission Expires: 8/29/03



By: William A. Hoas
(signature)

William A. Hoas
(printed or typed name)

As Authorized By:
MCLEODUSA TELECOMMUNICATIONS SERVICES, INC.

Date: 1/10/01

STATE OF ILLINOIS

COUNTY OF COOK

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VERIFICATION

I, William A. Haas, on oath state that I represent McLeodUSA
Telecommunications Services, Inc., that I have read the foregoing Joint Petition, and that the
information contained therein is true and correct to the best of my knowledge and belief.

William A. Haas

Subscribed and Sworn to
Before me this 11th day of
January, 2001.

Melanie Kadera
Notary Public

My Commission Expires:



By: Carol P. Pomponio

Carol P. Pomponio

As Authorized By:
XO ILLINOIS, INC.

Date: 01/09/01

STATE OF ILLINOIS

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COUNTY OF COOK

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VERIFICATION

I, Carol P. Pomponio, on oath state that I represent XO Illinois, Inc., that I have read the foregoing Joint Petition, and that the information contained therein is true and correct to the best of my knowledge and belief.

Carol Pomponio

Subscribed and Sworn to
Before me this 9th day of
January, 2001.

Therese M. Moore
Notary Public

My Commission Expires: 02/17/04



By: 
(signature)

Glenn A. Harris
(printed or typed name)

As Authorized By:
NORTHPOINT COMMUNICATIONS, INC.

Date: January 25, 2001

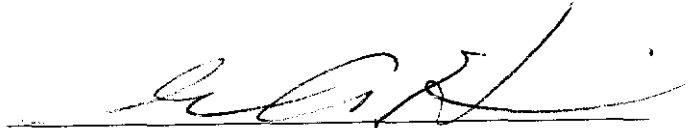
STATE OF ILLINOIS

COUNTY OF COOK

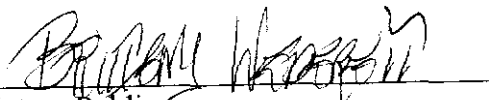
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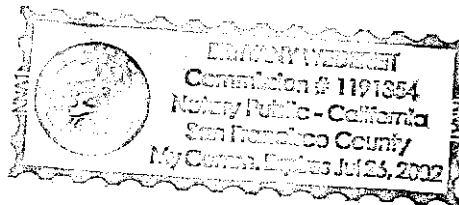
VERIFICATION

I, Glenn A. Harris, on oath state that I represent Northpoint Communications, Inc., that I have read the foregoing Joint Petition, and that the information contained therein is true and correct to the best of my knowledge and belief.

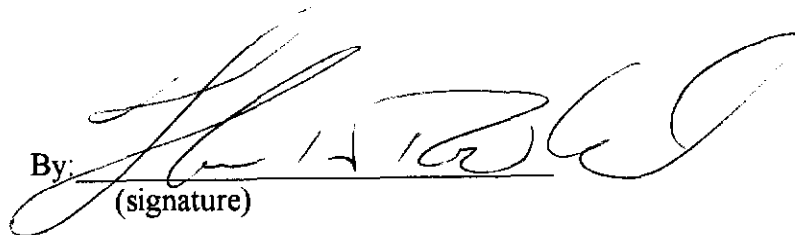


Subscribed and Sworn to
Before me this 25th day of
January, 2001.


Notary Public



My Commission Expires: July 26, 2002

By: 
(signature)

Thomas H. Rowland
(printed or typed name)

As Authorized By:
RHYTHMS NETCONNECTIONS AND RHYTHMS LINKS, INC.

Date: January 31, 2001

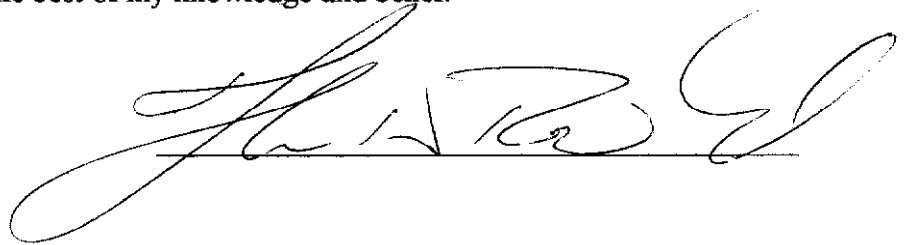
STATE OF ILLINOIS

COUNTY OF COOK

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VERIFICATION

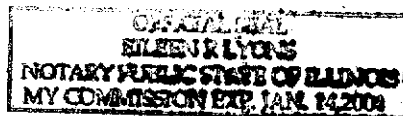
I, Thomas H. Rowland, on oath state that I represent Rhythms Netconnections and Rhythms Links, Inc., that I have read the foregoing Joint Petition, and that the information contained therein is true and correct to the best of my knowledge and belief.



Subscribed and Sworn to
Before me this 2nd day of
February, 2001.


Notary Public

My Commission Expires:



By: Kenneth A. Schiffman
(signature)

Kenneth A. Schiffman
(printed or typed name)

As Authorized By:
SPRINT COMMUNICATIONS, L.P.

Date: 1/23/01

Missouri
STATE OF ILLINOIS
COUNTY OF COOK
JACKSON

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VERIFICATION

I, Kenneth Schifman, on oath state that I represent Sprint Communications
L.P., that I have read the foregoing Joint Petition, and that the information contained therein is true and
correct to the best of my knowledge and belief.

Kenneth Schifman

Subscribed and Sworn to
Before me this 23rd day of
January, 2001.

Sally J. Werts
Notary Public

My Commission Expires:

SALLY J. WERTS
Notary Public - Notary Seal
State of Missouri
Platte County
My Commission Expires: Oct. 3, 2004

By: Paul Rebey
(signature)
PAUL REBEY
(printed or typed name)

As Authorized By:
FOCAL COMMUNICATIONS CORPORATION OF ILLINOIS

Date: January 25, 2001

STATE OF ILLINOIS

COUNTY OF COOK

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VERIFICATION

I, PAUL REBEY, on oath state that I represent Focal Communications Corporation of Illinois, that I have read the foregoing Joint Petition, and that the information contained therein is true and correct to the best of my knowledge and belief.

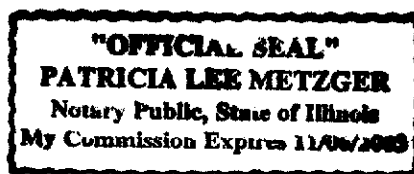
Paul Rebey

Subscribed and Sworn to
Before me this 26th day of
January, 2001.

Patricia Lee Metzger
Notary Public

My Commission Expires:

11/06/03



By: Carrie J. Hightman
(signature)

Carrie J. Hightman
(printed or typed name)

As Authorized By:
GABRIEL COMMUNICATIONS OF ILLINOIS, INC.

Date: 2/2/01

STATE OF ILLINOIS

COUNTY OF COOK

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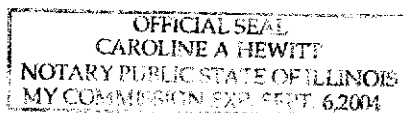
VERIFICATION

I, Carrie J. Hightman, on oath state that I represent Gabriel Communications of Illinois, Inc., that I have read the foregoing Joint Petition, and that the information contained therein is true and correct to the best of my knowledge and belief.

Carrie J. Hightman

Subscribed and Sworn to
Before me this 2ND day of
~~January~~, 2001.

Feb.



Caroline Hewitt
Notary Public

My Commission Expires:

CERTIFICATE OF SERVICE

I, Louise A. Sunderland, an attorney, hereby certify that copies of the Joint Petition were served upon the persons on the attached service list on February 2, 2001, and upon the other persons on the attached service list by U.S. Mail or Federal Express from Chicago, Illinois.


Louise A. Sunderland

SERVICE LIST

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Chicago, Illinois 60601

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Darrell Townsley
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Rowland & Moore
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Chicago, Illinois 60601